UNITED STATES DISTRICT COURT DISTRICT OF MINNESOTA

In re: BAIR HUGGER FORCED AIR WARMING DEVICES PRODUCTS LIABILITY LITIGATION

MDL No 15-2666 (JNE/FLN)

This Document Relates to:

All Actions

LOCAL RULE 7.1 CERTIFICATE

OF COMPLIANCE

I certify that Third Parties' Memorandum in Opposition to Motion to Compel conforms to the requirements of LR 7.1(f) and LR 7.1(h) for a memorandum produced with a proportional font. The length of this memorandum is 1,625 words. The memorandum was prepared using Microsoft Word, and the word-count function of the software has been applied specifically to include all text, including headings, footnotes, and quotations for word count purposes.

Respectfully submitted,

s/ J. Randall Benham

J. Randall Benham

MN Bar No. 0154726 6581 City West Parkway Eden Prairie, MN 55127